

Douglas R. Dollinger (*pro hac vice*) (NY Bar No. 2354926)  
Law Offices of Douglas Dollinger  
50 Main Street Suite 1100  
White Plains, NY 10606  
Telephone: 845-915-6800  
Facsimile: 845-915-6801  
E-mail: ddollingeresq@gmail.com

Seth D. Heyman (CA Bar No. 194120CA)  
Heyman Law Offices  
Suite 900  
2600 Michelson Drive  
Irvine, CA 92612  
Telephone: 855-439-6628  
Facsimile: 855-407-7714  
E-mail: sdh@heymanlegal.com

*Attorneys for Plaintiffs Indiezone, Inc. and eoBuy Licensing Ltd.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Indiezone, Inc., a Delaware corporation, and  
EoBuy, Limited an Irish private limited  
company,

Plaintiffs,

vs.

Todd Rooke, Joe Rogness, Phil Hazel, Sam  
Ashkar, Holly Oliver and U.S. Bank,  
collectively the ***RICO Defendants***;

Jingit LLC, Jingit Holdings, LLC, Jingit  
Financial Services LLC., Music.Me, LLC.,  
Tony Abena, John E. Fleming, Dan Frawley,  
Dave Moorehouse II, Chris Ohlsen, Justin  
James, Shannon Davis, Chris Karls in their  
capacities as officers, agents and/or  
employees of Jingit LLC, ***Defendants in  
Negligence, and Aiding/Abetting***;

Wal-Mart, General Electric, Target, DOE(s)  
and ROE(s) 1 through 10, ***Defendants in  
Negligence Secondary-Vicarious  
Infringement***,

Defendants.

**Case No: 3:13-cv-04280 VC**

**DECLARATION OF DOUGLAS R.  
DOLLINGER IN SUPPORT OF  
PLAINTIFFS' OPPOSED MOTION FOR  
AN ENLARGEMENT OF TIME TO  
REPLY TO DEFENDANTS' RESPONSE  
TO MOTION TO AMEND COMPLAINT  
AND DEFENDANTS' RESPONSE TO  
MOTION REQUESTING AN  
ENLARGEMENT OF TIME TO SUBMIT  
A CORRECTED RESPONSE TO THE  
DEFENDANTS' MOTIONS TO COMPEL  
ARBITRATION, DISMISS OR STAY  
THE PROCEEDINGS PURSUANT TO  
CIVIL LOCAL RULES 6-3.**

Courtroom: 4, 17<sup>th</sup> Floor  
District Judge Vince Chhabria

